



H A D D O N
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Haddon, Morgan and Foreman, P.C
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
lmenninger@hmflaw.com

August 24, 2020

VIA ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Request to File Under Seal: Proposed Redactions to Request to Modify Protective Order and Reply in Support Thereof
United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Dear Judge Nathan:

This is a letter motion to file under seal Ms. Maxwell's Proposed Redactions to Request to Modify Protective Order ("Proposed Redactions") as well as her Reply in Support of Request to Modify Protective Order ("Reply").

The Protective Order in this case states:

The Defendant, Defense Counsel, Defense Staff, Defense Experts/Advisors, Potential Defense Witnesses, and Other Authorized Persons are prohibited from filing publicly as an attachment to a filing or excerpted within a filing any Confidential Information or Highly Confidential Information referenced in the Discovery, unless authorized by the Government in writing or by Order of the Court. Any such filings must be filed under seal, unless authorized by the Government in writing or by Order of the Court.

See Protective Order (Doc. 36) at ¶ 15.

The Proposed Redactions and the Reply contain content designated as Confidential Information by the Government under the terms of the Protective Order.

Ms. Maxwell therefore requests permission to file the Proposed Redactions and Reply under seal, at least until such time as the Court has ruled on the proposed redactions set forth therein.

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Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger

CC: All Counsel of Record (Via ECF)